

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DEBORAH WILKERSON

Plaintiff

DISCRIMINATION AND VIOLATION

OF CIVIL RIGHTS, SAFE SENIORS CITIZEN ACT,

SENIOR SAFE ACT

VS.

CIVIL ACTION NO. 4:21cv1038

**CHASE BANK, CHASE BANK,
JP MORGAN CHASE BANK NA in TEXAS,.
AND JAMES DIMON, PRESIDENT**

Defendants

**PLAINTIFF'S ORIGINAL COMPLAINT FOR VIOLATION OF SAFE SENIORS
CITIZENS ACT AND CITIZENS WITH DISABILITIES**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Deborah Wilkerson Plaintiff, and petitions this Court, pursuant to the Safe Seniors Citizen Act a federal law to keep U.S. Senior Citizens from being scammed by corporations and financial institutions under the color of being huge corporations. Senior citizens are scammed out of over 50 billion dollars a year under the pretense of business as usual by big corporations. Defendants in this complaint knowingly, intentionally, and recklessly,

committed fraud to persuade Plaintiff to purchase several Cashier Checks in Texas at Chase Banks, **Void after 7 years** clearly visible on face. Defendants provided Plaintiff with incorrect information and cause Plaintiff damages by not giving Plaintiff an opportunity to cash the checks before the time of the expiration period on the face of the checks. Plaintiff needed the money to pay for emergency expenses. Defendant assisted in the illegal taking of Plaintiff's property (money).

This action is brought by Plaintiff for violation of Civil Rights Act, Safe Seniors Citizen Act and 14th Amendment U.S.C. alleging systematic pattern or practice of discrimination, and denial of rights raising issues of general public importance in violation of equal protection for Senior Citizens.

The Senior Consumer Protection Act, which helps shield seniors from financial predators. It allows senior consumers - individuals 60 years of age or older - to seek legal action against individuals who knowingly and unscrupulously obtain control of seniors assets and property.

Colorable transaction. One presenting an appearance which does not correspond with the reality, and ordinarily, an appearance intended to conceal or to deceive. **In an emergency** Plaintiff was denied the right to cash cashier checks that had not expired as per the date on the face of the check. As per this filing the 7 year period still have not been reached.

JP Morgan Chase Bank under the Safe Seniors Citizen Act was enlisted to fight against and suppose to take steps to protect older Americans from the very financial Abuse crimes.

Chase Bank created a scam with their own form of financial exploitation. To deprive a senior of their property and made a senior become a victim themselves. This is no false claim, because this Bank and financial provider suspected of the very prevalent form of abuse.

Defendant scammers have threatened Plaintiff by not even responding to Plaintiff about where Plaintiff's monies are located. The scam started immediately when the Chase Bank company

would not process Plaintiff Cashier Checks. Plaintiff a single disabled female never realized that she was being scammed. Plaintiff operates on a fixed income.

PARTIES

1. **Plaintiff** Deborah Wilkerson is an individual and is over the age of 65 which is the minimum age requirement for senior citizen. Plaintiff is also a Black U.S. Citizen.

P. O. Box 411

Houston, Texas 77001

Harris, County

(713) 346 383-8122

2. **Defendant** Chase Bank, JP Morgan, a Bank and James Dimon. Defendant has its principle place of business in Texas. Defendant may be served with process by sending a copy of summons and complaint registered/certified mail return receipt to James Dimon in his official capacity as CEO.

Chase Bank, JP Morgan Chase Bank, NA

1111 Polaris Parkway

Columbus, Oh 43240

JURISDICTION AND VENUE

This complaint is brought under the Safe Senior Citizens Act which is a Federal Law to protect senior U.S. citizens from Predatory Scams, and because the Defendants headquarters are in another state this Court has Subject Matter Jurisdiction.

Defendant Chase Bank, JP Morgan, NA a Bank and James Dimon in official capacity as President doing business in the State of Texas. This Court has jurisdiction of this case under the color of state, equal protection, due process, taking of private property, Safe Seniors Citizens Act.

CAUSE OF ACTION

VIOLATIONS OF THE CIVIL RIGHTS ACT OF 1866

Plaintiff herein incorporates the preceding paragraphs. A summary of how this scam began is addressed in the body of this Complaint. Defendants knowingly, intentionally, and recklessly conspired together in Violation of Plaintiff' Civil Rights under the Safe Senior Act. Defendants committed fraud providing incorrect information to cheating Plaintiff out of money; when needed for an emergency. The representative at the time Exhibit "A" Copy of Contract . Plaintiff purchase Cashier Checks from Chase Banks in Texas.

This is an example of the power of companies to strike fear and anxiety and to intimidate the senior citizen and least powerful among us.

Plaintiff is filing this complaint for scamming of a senior citizen, discrimination, and violation of civil rights based on age that resulted in money damages of over \$100,000.00 illegally taken by Defendants.

Taking of property (monies) criminally under the color of state that is resistant to the full enjoyment of rights granted by the 1871 Civil Rights Act

A denial to a senior citizen of rights granted by 1871 Civils Rights Act, which denial raises an issue of general public importance, pursuant to 42 U.S.C.A. and have suffered damages as a result of Defendants conduct described above.

The Defendants conduct described above was intentional, willful, and taken in disrespect for the right of others.

Declares that the Defendants policies and practices, as an alleged herein, violates the Safe Senior Citizens Act, and all other violation stated above in this complaint.

CAUSE OF ACTION

DECLARATORY INJUNCTION

Plaintiff herein incorporates the preceding paragraphs. Enjoin the Defendants, its officers, employees, agents, and successors, and all other persons in active concert or participation with any of them, from:

Participating or practicing, or causing the criminal taking of property and monies under color of state that indicate a preference, limitation, or intention to discriminate based on age.

Requires further injunctive relief against the Defendants as is necessary to effectuate the purposes of the 1866 Civil Right Act.

PRAYER

Plaintiff Pray: that Court award such any and all related damages to the circumstances as would fully compensate Plaintiff for aggrieved. by the Defendants predatory practices pursuant to the Safe Senior Act.


Award punitive damages to Plaintiff aggrieved by Defendants discrimination actions or discriminatory practices, pursuant to 1871 Civil Rights Act, Safe Seniors Act a Federal law to keep U.S. senior citizens from being scammed by corporations under color of being a huge corporation, or financial Institution.

Plaintiff has been deprived property (money), and mental anguish since Defendant refused to cash Plaintiff cashier checks, before the expiration date on the face of the checks.

Award a civil penalty against Defendants in the amount authorized by the Court in order to vindicate the public interest.

Plaintiff further prays for such additional relief as the interest of justice may require.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Deborah Wilkerson", is positioned above a horizontal line.

Deborah Wilkerson

P. O. Box 411

Houston, Texas 77001

(346) 383-8122

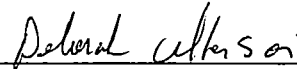
Attorney Pro Se

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this instrument was served by U.S. certified mail and court submission to all counsels of record on March 17, 2021 pursuant to Federal Rules of Civil Procedure 4.

Chase Bank, JP Morgan Chase Bank, NA

REGISTERED AGENT:
C T Corporation System
1999 Bryan St., Ste. 900
Dallas, Texas 75201

A handwritten signature in cursive script, reading "Deborah Wilkerson", is written over a horizontal line.

Deborah Wilkerson

P. O. Box 411

Houston, Texas 77001

(346) 383-8122

Attorney Pro Se

EXHIBIT A

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK

CASHIER'S CHECK

HOLD DOCUMENT UP TO THE LIGHT TO VIEW TRUE WATERMARK



Date 02/02/2021

94048
Void after 7 years25-3
440

Remitter: DEBORAH WILKERSON

Pay To The Order Of: HARRIS COUNTY JUSTICE OF PEACE COURT

Pay: FORTY FOUR DOLLARS AND 00 CENTS

\$** 44.00 **

Drawer: JPMORGAN CHASE BANK, N.A.

Reginald Chambers, Chief Administrative Officer
JPMorgan Chase Bank, N.A.
Columbus, OH

Do not write outside this box. REQUEST FOR A TOW HEARING

\$44.00 FEE Filing to Justice of Peace TOW HEARING

RFF: Vehicle 3007 CHASE 300 HEMIC Block

Memo: LICENSE PLATE CR 16 677-22

COPIED BY TOW HEARING

Note: For information only. Comment has no effect on bank's payment.

94048 044000037 75866

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

CHASE BANK, JP Morgan Chase Bank
P.O. Box 182051Columbus, OH 43218-2051
Attn: CEO, AGENT, ...
Re: Debit Card Fraud for Chase Bank

9590 9402 6009 0069 1572 34

2. Article Number (Transfer from service label)

Certified Mail 7020 316 0000 217175299

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

CHASE BANK - TORREY BRANCH #0151
4165 Cypress Creek Parkway
Houston, Texas 77066Attn: NICCOL R. SPIKES, NMLS ID
126047 Vice President, Branch Manager

9590 9402 5956 0062 0020 14

2. Article Number (Transfer from service label)

Certified Mail 7020 0640 0001 20875439

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

RFD 488566-0379

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

\$7.65 Returned Receipt \$12.85

Clerk #32 Certified \$3.60

First class Mail \$1.20

Receipt # B40-57700385-4 9925489-2

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Exhibit
7067
1087